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17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA
19 WESTERN DIVISION
20

21 SONY CORPORATION, A Japanese
Corporation,

22 Plaintiff,

23 vs.
24

VIZIO, Inc.,

25 Defendant.
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Case No. CV08-01135-RGK (FMOx)

**JOINT STIPULATION AND
MOTION FOR PROTECTIVE
ORDER**

[DISCOVERY MATTER]

**Judge: Hon. Fernando M. Olguin
Trial Date: January 26, 2010**

1 TO THE CLERK OF COURT, ALL PARTIES, AND THEIR
2 ATTORNEYS OF RECORD:

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4 WHEREAS, plaintiff Sony Corporation (“Sony” and Defendant Vizio,
5 Inc. (“Vizio”) are presently engaged in discovery in this action;

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7 WHEREAS, Sony and Vizio have determined that materials sought in
8 response to these requests contain sensitive, confidential, and/or proprietary
9 information;

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11 WHEREAS, Sony and Vizio have good cause to protect the
12 confidentiality of certain materials that contain sensitive, confidential, and/or
13 proprietary information;

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15 WHEREAS, in order to avoid the risk of this information being
16 inappropriately made public or used for purposes beyond this litigation, Sony and
17 Vizio believe the entry of a Protective Order is appropriate in this action;

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1 THEREFORE Sony and Vizio hereby stipulate and agree, and jointly move the
2 Court, for the entry of the attached Protective Order.
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5 Date: June 8, 2009

QUINN EMANUEL URQUHART OLIVER &
6 HEDGES, LLP

7 By  /for
8 Kevin P.B. Johnson
9 Attorneys for Plaintiff Sony Corporation
10
11

12 Date: June 8, 2009

JONES DAY

13 By  (with permission)
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15 Attorneys for Defendant Vizio, Inc.
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